

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

Amy Connelly,	)	
Plaintiff,	)	
	)	Civil Action No. 2:20-cv-00064
v.	)	
	)	
City of St. Albans, Vermont,	)	
Gary Taylor, <i>individually and in his</i>	)	
<i>official capacity as Chief of Police for</i>	)	
<i>the City of St. Albans, Vermont,</i>	)	
Jason Lawton, Zachary Koch, and	)	
Michael Ferguson, <i>individually and in</i>	)	
<i>their capacities as police officer for</i>	)	
<i>the City of St. Albans, Vermont,</i>	)	
Defendants.	)	

**STATEMENT OF UNDISPUTED MATERIAL FACTS**  
**IN SUPPORT OF DEFENDANT MICHAEL FERGUSON'S**  
**MOTION FOR SUMMARY JUDGMENT**

**Exhibit List**

- A. Exhibit A – Affidavit of Officer Zachary Koch
- B. Exhibit B – Supplemental Affidavit of Sergeant Jason Lawton
- C. Exhibit C – Declaration of Michael Ferguson
- D. Exhibit D – Declaration of James F. Conway, III
  - 1. Attachment 1 – DataMaster Video SAPD
  - 2. Attachment 2 – Connelly Holding Cell Video
  - 3. Attachment 3 – Lawton Body Camera Video
  - 4. Attachment 4 – Koch Body Camera Video
  - 5. Attachment 5 – Processing Video SAPD
  - 6. Attachment 6 – Defendant Michael Ferguson's First Requests for Admission



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